



STATE OF IOWA

TERRY E. BRANSTAD, GOVERNOR
KIM REYNOLDS, LT. GOVERNOR

DEPARTMENT OF NATURAL RESOURCES
CHUCK GIPP, DIRECTOR

March 30, 2017

Prestage Farms of Iowa, LLC
C/o Dennis Benning
1421 S Bell Ave., Suite 107
Ames, Iowa 50010

SUBJECT: Animal Feeding Operation (AFO) Compliance Inspection for – Prestage Farms of Iowa P278,
County – Franklin, – Facility #65299

Dear Mr. Benning:

Attached is a copy of the report resulting from the Animal Feeding Operation (AFO) facility compliance inspection on March 16, 2017.

Your attention is directed to the requirements and recommendations portion of the report.

If you have any questions, or feel this report does not represent the conditions at your facility, please call me at 641/424-4073.

Sincerely,

Trent Lambert, Environmental Specialist Senior
trent.lambert@dnr.iowa.gov
Field Services and Compliance Bureau

c: -Stephen Pollard, U.S. EPA Region 7, WWPD/WENF (electronic)
-Gene Tinker, AFO Coordinator, Des Moines (electronic)
-Ken Hessenius, AFO Enforcement Coordinator, FO#3 (electronic)

enc: -AFO Facility Inspection Report
-MMP Inspection Form
-Animal Feeding Operation (AFO) Regulatory Status Form
-Desktop Assessment Form
-Photos of Site and Aerial Photo

IOWA DEPARTMENT OF NATURAL RESOURCES

AFO INSPECTION REPORT

FACILITY DESCRIPTION

FACILITY LOCATION	Facility: Prestage Farms of Iowa P278			Facility ID#: 65299	
	Address: 2309 135th St.		City: Geneva	State: IA	Zip: 50633
	PLSS: Section 2, Geneva Township (T91N, R19W), Franklin County				
OWNER	Name: Prestage Farms of Iowa, LLC				
	Address: 1421 S Bell Ave.		City: Ames	State: IA	Zip: 50010
ANIMAL HOUSING TYPE	<input checked="" type="checkbox"/> Confinement <input type="checkbox"/> Open Lot <input type="checkbox"/> Combined (Confinement & Open Lot)				
ANIMAL INFORMATION	Animal Type(s)	Capacity	Current Head	Number of Bldgs./Pens	
	Swine	4800-Head	4800	1 - Building	
	Date of Construction: 2007		Date of Expansion: N/A		

INSPECTION INFORMATION

INSPECTION DATE	This Inspection: 16 MAR 17	Last Inspection: N/A
PERSONS INTERVIEWED	Name:	Title:
	Name: Dennis Benning	Title: Facility Environmental Consultant
	Name:	Title:
NEAREST WATERCOURSE	Stream Name: Maynes Creek	
	Description of Flow Path: Predominantly overland flow to the south.	

COMPLIANCE SUMMARY

OBSERVATIONS	Nutrient Management: <input type="checkbox"/> CNMP <input type="checkbox"/> NMP <input checked="" type="checkbox"/> MMP <input type="checkbox"/> Other <input type="checkbox"/> No formal plan			
	Manure Stockpiling: <input type="checkbox"/> In controlled area <input type="checkbox"/> In compliance with rules <input checked="" type="checkbox"/> Not applicable – direct haul <input type="checkbox"/> Stockpiling in an uncontrolled area	Mortality Management: <input checked="" type="checkbox"/> Rendering <input type="checkbox"/> Composting <input type="checkbox"/> Incineration <input type="checkbox"/> On-site burial <input type="checkbox"/> Landfill	Runoff from Feed Storage: <input checked="" type="checkbox"/> No outdoor feed storage area <input type="checkbox"/> Discharge from feedstock storage area is controlled <input type="checkbox"/> Feed storage is located in an uncontrolled area	
	Clean Water Diverted: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Discharge to a Water of the U.S. via Manmade Conveyance: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Direct Animal Contact with Waters of the U.S.: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
	Adjacent Facilities (by same owner/operator): <input type="checkbox"/> Confinement <input type="checkbox"/> Open Lot <input checked="" type="checkbox"/> None			
	Evidence of Discharges: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
	No evidence of current or past discharge observed at time of inspection.			
NPDES PERMIT STATUS	The facility, as observed during the inspection, was a Large CAFO and did not need an NPDES permit. NPDES permit is required: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
COMPLIANCE STATUS	This facility appeared to be in compliance with Iowa's environmental regulations at the time of the inspection. Actual conditions may vary over time with the operation and maintenance of the facility. Facility is in compliance: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
AUTHENTICATION	Inspector: Trent Lambert	Date: 30 MAR 17	Reviewer: Scott Wilson	Date:

IOWA DEPARTMENT OF NATURAL RESOURCES **AFO INSPECTION REPORT**

FACILITY EVALUATION

Bio-Security

Prior to my inspection I discussed bio-security with Mr. Benning, the facility representative. Mr. Benning did not express a specific facility bio-security policy more restrictive than the Department's standard policy. Consequently, the Department's approved bio-security policy was followed.

Facility Description

This facility is comprised of one confinement building, with a concrete, below-building deep pit serving as manure storage. The facility was originally constructed in 2007 under the authority of Construction Permit CP-A2007-134, and has not been expanded since. Feed is contained in bulk bins, and carcasses are rendered. There is no manure stockpiling or carcass composting on-site.

Watercourse Evaluation/Tile Intakes

During my on-site inspection, I did not observe drainage tile surface intake(s) on-site or in the immediate vicinity of the facility. Site drainage appears to be to the south, and potentially to the east and then south; however, the surrounding topography is considerably flat and the nearest water source, Maynes Creek, is located approximately 4600-feet to the south of the facility. Consequently, unless unobserved tile intakes exist, the chance of site runoff resulting in a discharge of pollutants to Maynes Creek appears unlikely.



Looking south to Maynes Creek (tree line in distance to left of photo) – showing flatness of topography



Looking east/southeast toward Maynes Creek (tree line in distance to right of photo) – showing flatness of topography

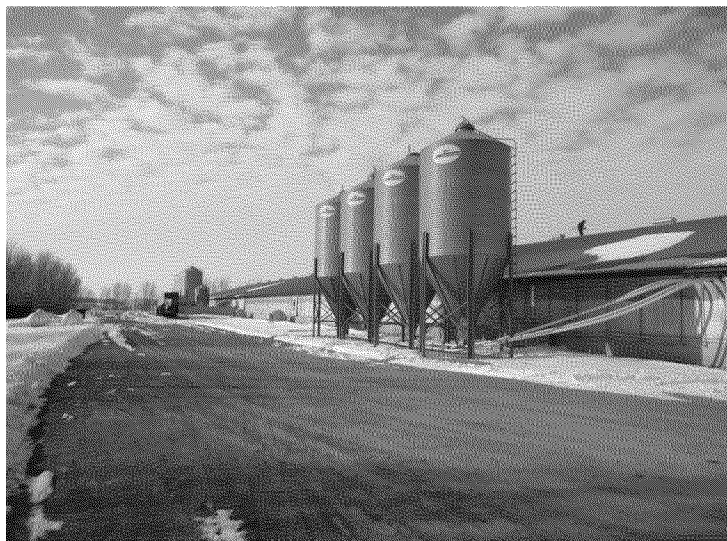
Manure Storage Structures

During the inspection, the building was observed. I observed that portion of the concrete which was visible above-ground. This amounted to approximately 2-feet of concrete, which would be above the slats covering the below-building deep pits. The observed concrete appeared to be structurally sound and I did not observe any evidence of manure discharges from or in the vicinity of the building. I observed no evidence of cracking, excessive spalling or other issues of concern regarding the visible portion of the concrete.

While no evidence of discharge was observed during this inspection, it is recommended that the manure storage structure be inspected for discharges and needed repairs regularly, as confinement feeding operations must contain all manure produced between periods of application. As stated above, any discharges may require an NPDES permit for the operation.

Feed System

During the inspection, I observed the bulk bin feed system serving each building. All bins, feed conveyance pipes and various attachments appeared to be intact and effectively containing feed. Still, this part of the operation should be inspected frequently, as runoff water could carry spilled feed into a water course where it could create violations of state water quality standards. Discharge of such process water would potentially require an NPDES permit.



East end of building and feed storage bins



North end of building and building ventilation fans

Well

The water well serving this facility is located approximately 200-feet northwest of the confinement building. The area between the well and the building is significantly flat. Additionally, although there was snow cover on the area at the time of the inspection, historic aerial photography and general site observations indicate the area is vegetated (mowed grass). The combination of distance and vegetative ground cover should provide some measure of well protection from contamination due to a discharge.



Looking southeast from well to building

Carcass Disposal

Carcasses were historically incinerated at this facility, however the incinerator has not been utilized in many years. Currently, carcasses are rendered on-site. There is a dead box located on the east side of the building, on the packed gravel drive. The surrounding area is particularly flat and I observed no tile intakes in the area. Therefore, it appears to be in a good location with regard to the potential for surface runoff. No carcasses were visible at the time of the inspection.



Defunct incinerator and ash storage structure



Currently-utilized rendering dead box

Manure Management Plan

In conjunction with the on-site facility inspection, the MMP and associated record keeping was reviewed. The MMP and associated land-application records were current and complete and the requisite P-Index soil sampling has been conducted as required. Consultation of the DNR Field Office facility file revealed that both annual MMP updates and 4-year, updated P-Index MMPs have been submitted timely. I did not observe any obvious deficiencies with regard to the MMP or associated records. The next 4-year, updated P-Index MMP is due by July 1, 2019. Manure land-application is conducted by Krukow Custom Manure (1634CMS). Consultation of the department's Manure Applicator Certification database verified that the manager and twelve individual employees currently hold valid certifications.

REQUIREMENTS

None at this time

RECOMMENDATIONS

- 1) Inspect manure storage structures, carcass disposal areas and feeding system components on a frequent and regular basis as the discharge of pollutants from these areas could potentially require a National Pollutant Discharge Elimination System (NPDES) permit.

SUMMARY

This facility is a Large CAFO, consisting of one swine finishing confinement building which was constructed in 2007 under the authority of Construction Permit CP-A2007-134. Manure storage is accomplished via a formed, concrete below-building pit. The visible portions of the manure storage structure appeared to be structurally sound, and I did not observe evidence of current or past manure discharges. Feed is contained in enclosed bins and conveyance tubes. Carcasses are rendered.

In conclusion, I did not observe evidence of either manure or process water discharges from this facility at the time of the inspection. It is therefore my determination, based upon my observations during this inspection and my pre-inspection file review, that this Large CAFO is a non-discharging facility; and an NPDES permit is not required for this facility at this time.

At the conclusion of the inspection, the facility Regulatory Status determination was discussed with Mr. Benning. He did not express any questions or concerns regarding my determination.

IOWA DEPARTMENT OF NATURAL RESOURCES **AFO INSPECTION REPORT**

AERIAL PHOTOS OF: Prestage Farms PI278

DNR AFO Siting Atlas – 2015 NAIP



Bing Maps



IOWA DEPARTMENT OF NATURAL RESOURCES
AFO Desktop Assessment Form

Assessor:	Trent Lambert	Assessment Date:	15 MAR 17		
Documentation Examined:					
<input checked="" type="checkbox"/> AFO Siting Atlas	<input checked="" type="checkbox"/> Facility File	<input checked="" type="checkbox"/> FOCD	<input checked="" type="checkbox"/> AFO Database		
<input checked="" type="checkbox"/> MMP	<input checked="" type="checkbox"/> Public Mapping Information Bing Maps		<input checked="" type="checkbox"/> Other LiDAR Mapping		
FACILITY LOCATION	FACILITY: Prestage Farms of Iowa P278		FACILITY ID#: 65299		
	ADDRESS: 2309 135th St.	CITY: Geneva	STATE: IA ZIP: 50633		
	PLSS: Section 2, Geneva Township (T91N, R19W), Franklin County				
OWNER	NAME: Prestage Farms of Iowa, LLC				
	ADDRESS: 1421 S Bell Ave.	CITY: Ames	STATE: IA ZIP: 50010		
	WORK: 515-233-8200	HOME:	CELL:		
	EMAIL:				
ANIMAL INFORMATION	ANIMAL TYPE(S)	CAPACITY	CURRENT HEAD	# OF PENS	# OF BUILDINGS
	Swine	4800-Head	UNK	UNK	1
FACILITY TYPE	<input checked="" type="checkbox"/> Confinement		<input type="checkbox"/> Open Lot		<input type="checkbox"/> Combined
STORAGE TYPE	<input checked="" type="checkbox"/> Liquid	<input type="checkbox"/> Dry		<input checked="" type="checkbox"/> Covered	<input type="checkbox"/> Uncovered
STORAGE STRUCTURE TYPE	<input type="checkbox"/> Earthen Manure Storage Structure	#		<input type="checkbox"/> Anaerobic Lagoon	#
	<input checked="" type="checkbox"/> Below Building Pit	# 1		<input type="checkbox"/> Aerobic Lagoon	#
	<input type="checkbox"/> Outside Concrete Pit	#		<input type="checkbox"/> Outside Stockpile	#
	<input type="checkbox"/> Slurry-store	#		<input type="checkbox"/> Covered Stockpile	#
	<input type="checkbox"/> Unknown				
AFO/CAFO Status	<input checked="" type="checkbox"/> Large CAFO [†]		<input type="checkbox"/> Medium AFO		<input type="checkbox"/> Small AFO
	[†] All large CAFOs require an onsite inspection.				
NEAREST WATERCOURSE	Watercourse Name: Maynes Creek				
	Distance between facility and nearest watercourse:		<input type="checkbox"/> < ¼ mile ^{††}		<input checked="" type="checkbox"/> > ¼ mile
	Description of flow path(s) to watercourse: Predominantly overland flow to the south.				
^{††} All medium combined or open lot AFOs within a ¼ mile of a watercourse and that drain towards that watercourse require an onsite inspection. All medium confinement AFOs that utilize uncovered manure/litter storage and are within a ¼ mile of a watercourse and that drain towards that watercourse require an onsite inspection.					
COMPLIANCE HISTORY	Has there been a discharge to a Water of the U.S. within the last 5 years?		<input type="checkbox"/> Yes ^{†††}		<input checked="" type="checkbox"/> No
	If yes, did the facility permanently remedy the cause of the discharge?		<input type="checkbox"/> Yes		<input type="checkbox"/> No
			<input type="checkbox"/> Unknown		
	^{†††} All medium confinement AFOs that have discharged to water of the U.S. within the last 5 years require an onsite inspection.				
	Has there been a significant release within the last 5 years?		<input type="checkbox"/> Yes		<input checked="" type="checkbox"/> No
	If yes, did the release present a significant threat of discharge?		<input type="checkbox"/> Yes*		<input type="checkbox"/> No
			<input type="checkbox"/> Unknown		
	* All medium confinement AFOs that have had a significant release in the last 5 years and the release presented a significant threat of discharging to a water of the U.S. require an onsite inspection.				
	Have there been any complaint investigations?		<input type="checkbox"/> Yes		<input checked="" type="checkbox"/> No
	If yes, describe:				
Has an onsite inspection been conducted at this facility since 11/1/11?		<input type="checkbox"/> Yes		<input checked="" type="checkbox"/> No	
If yes, was the inspection functionally equivalent to facility type specific SOP (i.e., confinement, open feedlot or combined)?		<input type="checkbox"/> Yes**		<input type="checkbox"/> No	
		<input type="checkbox"/> N/A			
Inspection Date:		Describe:			
** No onsite inspection is required if a functionally equivalent inspection has been performed since 11/1/11.					

RUNOFF ASSESSMENT	Is there evidence that manure, litter, or process wastewater is uncontrolled and/or unmanaged?		<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> Unknown
	If yes, describe: No evidence observed in aerial photography.				
	Are there tile intakes within 100 feet of the production area?		<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> Unknown
	If yes, describe: None observed in aerial photography.				
	Does the facility utilize uncovered/uncontrolled composting areas?		<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Unknown
	If yes, describe: None observed in aerial photography.				
<u>Note: If assessor answered "Yes" to any of the questions in this section, then an onsite inspection should be performed.</u>					
	Assessment Notes/Comments:				
	<p>Review of available aerial photography did not reveal any obvious signs of discharge/runoff from the facility. There appears to be a rendering dead box enclosure on the east side of the facility, adjacent to the driveway, and there does not appear to be any composting on-site. The closest water source appears to be Maynes Creek, located approximately 4600-feet south of the facility. Maynes Creek is classified as a Major Water Source at this location. Consultation of LiDAR mapping revealed the most likely path of discharge would be overland flow to the south, toward the creek.</p> <p>There have been no previous on-site facility inspections, and there was no other file evidence (spill reports, complaints, etc.) of any documented discharge(s) from the facility.</p> <p>With an AUC of 1920, this facility is considered a Large CAFO. Per the IDNR/EPA Work Plan Agreement, all Large CAFOs must be inspected. Consequently, an on-site inspection of this facility will be conducted.</p>				
	<input checked="" type="checkbox"/> ONSITE INSPECTION REQUIRED.		<input type="checkbox"/> ONSITE INSPECTION <u>NOT</u> REQUIRED.		
AUTHENTICATION	INSPECTOR: Trent Lambert	DATE: 30 MAR 17	REVIEWER: Scott Wilson	DATE:	
<u>Note: This assessment was based on the information available on the date of the assessment. Conditions at this facility could change.</u>					



Animal Feeding Operation (AFO) Regulatory Status

Facility Name: Prestage Farms of Iowa P278 Facility ID: 65299 County: Franklin

- ☐ Large CAFO – Discharging – NPDES Permit Required
- ☒ Large CAFO – No discharge – No NPDES Permit Required
- ☐ Large CAFO – Has NPDES Permit
- ☐ Medium CAFO – NPDES Permit Required
- ☐ Medium AFO – No NPDES Required
- ☐ Medium AFO – Has NPDES Permit
- ☐ Designated CAFO – NPDES Permit Required
- ☐ Small AFO – No NPDES Permit Required

This determination was made based on conditions and observations made at the time of the inspection on March 16, 2017. Please note that the regulatory status of the facility can change if conditions at the facility change or are different from those documented during the inspection.

Inspector: Trent Lambert Date: 30 MAR 17

Regulatory Definitions of Large CAFOs, Medium CAFOs, and Small CAFOs

These regulatory definitions are from the Code of Federal Regulations (CFR), implementing the federal Clean Water Act.

A **Large CAFO** confines at least the number of animals described in the table below.

A **Medium CAFO** falls within the size range in the table below and either:

- “(A) Pollutants are discharged into waters of the United States through a man-made ditch, flushing system, or other similar man-made device; or
- (B) Pollutants are discharged directly into waters of the United States which originate outside of and pass over, across, or through the facility or otherwise come into direct contact with the animals confined in the operation.” 40 CFR 122.23(b)(6)(ii)

If an operation is found to be a significant contributor of pollutants to waters of the United States, the permitting authority may designate a medium-sized facility as a CAFO as provided in 40 CFR 122.23(c).

A **Small CAFO** confines the number of animals listed in the table **and** has been designated as a CAFO by the permitting authority after determining that it is a significant contributor of pollutants to waters of the United States as provided in 40 CFR 122.23(c).

Animal Sector	Size Thresholds (number of animals)		
	Large CAFOs	Medium CAFOs	Small CAFOs
cattle or cow/calf pairs	1,000 or more	300 – 999	less than 300
mature dairy cattle	700 or more	200 – 699	less than 200
veal calves	1,000 or more	300 – 999	less than 300
swine (weighing over 55 pounds)	2,500 or more	750 -2,499	less than 750
swine (weighing less than 55 pounds)	10,000 or more	3,000 – 9,999	less than 3,000
horses	500 or more	150 – 499	less than 150
sheep or lambs	10,000 or more	3,000 – 9,999	less than 3,000
turkeys	55,000 or more	16,500 – 54,999	less than 16,500
chickens other than laying hens (other than a liquid manure handling system)	125,000 or more	37,500 – 124,999	less than 37,500
laying hens (other than a liquid manure handling system)	82,000 or more	25,000 – 81,999	less than 25,000



IOWA DEPARTMENT OF NATURAL RESOURCES
ENFORCEMENT CHECKLIST FOR AFO/CAFO INSPECTIONS

INSPECTION DESCRIPTION

Date of Inspection 16 MAR 17
Facility Name Prestage Farms of Iowa P278 Facility ID# 65299
Facility Address 2309 135th St., Geneva, IA
Inspector's Name Trent Lambert

INSPECTION FINDINGS

Narrative Description of Investigation (evidence of current violations; indicators of past violations; future concerns):

The current inspection did not reveal any evidence of current or past discharges/violations, and there was nothing observed which would be indicative of future problems.

- ☒ Photographs and/or Video
- ☐ Water Samples (upstream and downstream)
- ☒ Personal Interviews
- ☐ Other _____

ACTIONS FOLLOWING INSPECTION

- ☒ **No further action taken – No violation(s) observed**
- ☐ Informal Meeting Date _____
- ☐ Letter of Inquiry Date _____
- ☐ Letter of Noncompliance Date _____
(Within 30 days of confirmation of Violation)
- ☐ Notice of Violation Letter Date _____
(Within 30 days of confirmation of Violation)

REFERRAL/NON-REFERRAL

- ☐ Non Referral; No referral warranted. Explanation:
- ☐ Referral; based on the following criteria:
- ☐ Fish kill/acute water quality degradation
(Manure spills and/or discharges that result in destruction of aquatic life, including fish, are a top priority)
- ☐ Serious water quality degradation
(Release of pollutants may result in degradation of an aquatic resource without an obvious fish kill, but the effect may be impaired use and enjoyment of the water resource or chronic pollution harming aquatic life)

- ☐ Discharges of pollutants to state waters not authorized by an NPDES permit
(This priority would include discharges from open feedlots or confinements to waters of the state, not authorized under conditions of an NPDES permit issued by the DNR. An impact on water quality is documented)
- ☐ Failure to obtain required NPDES permit
(A large CAFO, medium CAFO, or designated CAFO is found to have any documented discharge without, or in violation, of an NPDES permit)
- ☐ Unauthorized construction
(Construction of AFO/CAFO structures (including open feedlots) without, or contrary to, a permit or other required documentation is also a DNR priority. Proper compliance with AFO siting and construction requirements is essential elements of the AFO program, which helps keep pollutants out of streams)
- ☐ Significant violations of NPDES permit and/or conditions in the permit
(Violations of a significant nature and/or repeated violations of operating or reporting requirements)
- ☐ Failure to submit MMP updates
(MMPs are the cornerstone of the animal feeding program. The MMP helps ensure that any proposed or current confinement feeding operation over 500 animal units has adequate land to use the manure nutrients it produces)
- ☐ Failure to obtain proper manure application certification
(The manure applicator certification program is an important component of the AFO regulations. The program ensures that manure is transported and applied properly)
- ☐ Other _____

Date of Referral to Legal _____

**Contact Information Form**Facility Name Prestage Farms of Iowa P278Facility No. 65299Facility County FranklinContact Name Dennis BenningPhone No. 641-430-8617

Explain the purpose and expected duration for the compliance inspection. Inform the contact person that the on-site compliance inspection will include:

1. Review of the facility and manure records for the last 5 years – Make sure these are complete, organized and easy to read.
2. Review of the current MMP, NMP or CNMP – Make sure that the plan is complete and up-to-date.
3. Site “walk around” – This includes an assessment of the buildings, manure storage structures, stockpiles, feed storage, animal mortality storage area, manure application equipment, etc.
4. Assistance – Time will be provided to address the producer’s questions and discussion items.

Table 1: Attempts to Contact Producer

Telephone Information	Date	Time	Comments
Attempt #1	06 MAR 17	1530	Set-up Inspection
Attempt #2			
Attempt #3			
Site Visit (conduct inspection or leave door hanger)			
NOV Issued			

Table 2: Appointment Information

Date **16 MAR 17** Time **0900**

Meeting With **Dennis Benning – Facility Representative**

Meeting Place **Facility Site**

Biosecurity Policy Departmental ☒ Facility ☐

Entered on Outlook Calendar ☒

1. DNR environmental specialists will utilize this form when attempting to set up an appointment with a producer to do an on-site compliance inspection. The DNR specialist will use the following procedure:
 - 1) Attempt to contact a producer three times within a two-week period, documenting each attempt in Table 1.
 - 2) If unable to contact the producer, on the third attempt the specialist will leave a message on the producer’s voice mail or answering machine, if available, giving the time and place for the compliance inspection.
 - 3) At the appointed time, the DNR specialist will travel to the site to meet with the producer and conduct the inspection.
 - 4) If no one is present at the site, the specialist will post a notice requesting that the producer contact the local DNR office.
 - 5) If all aforementioned attempts to make contact with the producer fail, an NOV and/or referral to legal services for formal enforcement action may result.